

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE SEPTEMBER 11 LITIGATION

21 MC 101 (AKH)
This document relates to:
Bavis v. United Airlines Inc.
et al., 02 Civ. 7154;
World Trade Center
Properties LLC, et al. v.
United Airlines, Inc. et al.,
08 Civ. 3719; and
World Trade Center
Properties, LLC et al. v.
American Airlines, Inc., et
al., 08 Civ. 3722

**NOTICE OF MOTION OF ICTS INTERNATIONAL, N.V. FOR
SUMMARY JUDGMENT DISMISSING THE REMAINING ACTIONS
AGAINST IT**

PLEASE TAKE NOTICE, that defendant ICTS International, N.V. ("ICTS") will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, at a date and time to be set by the Court, for an Order pursuant to FRCP 56 granting ICTS summary judgment dismissing the remaining claims actions against it. The remaining wrongful death lawsuit in which ICTS is a defendant is Bavis v. United Airlines, Inc., et al., 02 Civ. 7154 (AKH). The two remaining property damage lawsuits in which ICTS is a defendant are World Trade Center Properties, LLC, et al. v. United Airlines, Inc., et al., 08 Civ. 3719 (AKH) and World Trade Center Properties LLC, et al. v. American Airlines, Inc., et al., 08 Civ. 3722 (AKH).

This motion is based on the documents set forth in the attached Table of Contents,

submitted in accordance with this Court's Rule 2(B).

Dated: New York, New York
May 3, 2011

McLaughlin & Stern, LLP

By  _____

Jon Paul Robbins

Attorneys for defendant ICTS
International, N.V.

260 Madison Avenue

New York, New York 10016

212-448-1100

TABLE OF CONTENTS, PURSUANT
TO RULE 2(B)

This motion is based on the following papers:

1. Declaration of David W. Sass, dated May 3, 2011

2. Declaration of Jon Paul Robbins, dated 3, 2011, with the following exhibits attached:

Exhibit 1: a copy of the Second Amended Complaint filed by plaintiff Mary Bavis under Case Number 02 Civ. 7154;

Exhibit 2: a copy of the Fourth Amended Flight 175 Master Liability Complaint filed in this action, which encompasses the claims alleged by Mary Bavis;

Exhibit 3: a copy of ICTS' Answer to the Fourth Amended Flight 175 Master Liability Complaint;

Exhibit 4: a copy of the Complaint filed by the WTCP plaintiffs under Case Number 08 Civ. 3719;

Exhibit 5: a copy of ICTS' Answer to the Complaint in Case Number 08 Civ. 3719;

Exhibit 6: a copy of the Complaint filed by the WTCP plaintiffs under Case Number 08 Civ. 3722;

Exhibit 7: a copy of ICTS' Answer to the complaint in Case Number 08 Civ. 3722;

Exhibit 8: a copy of Mary Sciavo's letter to the Court dated March 11, 2011, with the Court's endorsement.

3. Rule 56.1 Statement of Material Facts not in Dispute

4. Memorandum of law in support of motion, dated April 28, 2011.